

DEPARTMENT OF WATER AND POWER

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March 21, 1983

Mr. James H. Anthony
Project Director
Intermountain Power Project
931 General Office Building

Utah Air Conservation Committee (UACC)
Meeting on March 11, 1983 Concerning
Intermountain Power Project (IPP)
Air Quality Issues

This is to summarize issues regarding the IPP air quality permit raised by environmental groups, members of the UACC and the Director of the Bureau of Air Quality of the Utah Department of Health (DOH) at the regularly scheduled meeting of the UACC held on March 11, 1983.

A presentation was made by Mr. Sherman Young of the law firm of Ivie and Young of Provo, Utah, who apparently represents several environmental groups including the Sierra Club and the National Resource Defense Council. Mr. Young's position was that the IPP is not utilizing the Best Available Control Technology (BACT) for emissions of NOx and SO₂. He made reference to the California Air Resources Board (CARB) report "Guidelines for the Control of Emissions from Coal-Fired Power Plants" which concluded that BACT for NOx control is between 80 and 95 percent reduction and BACT for SO₂ control is approximately 95 percent reduction. He emphasized that existing emission controls on IPP require only a 37.5 percent reduction in NOx and a 90 percent reduction in SO₂ emissions and, therefore, fail to meet current BACT requirements. He also addressed the issue of acid rain and implied that further control of NOx emissions from IPP would reduce the likelihood of an increase in the acidity of Utah lakes.

Attached is a letter dated March 2, 1983 from Mr. Young to Dr. Brent Bradford, the Director of the Bureau of Air Quality, and also a document prepared by Mr. Young entitled "Proposed Comment for Submission to the Utah Air Quality Board in Reference to the Permitting Process for the Intermountain Power Project." These documents provide additional details of his position.

Dr. Bradford responded to Mr. Young's concerns by stating that he has contacted the CARB regarding their "Guidelines for the Control of Emissions from Coal-Fired Power Plants." However, the issue of BACT for NOx emissions would require additional detailed study by the Utah DOH before any conclusions could be drawn regarding this matter. Dr. Bradford also pointed out that the issue of acid rain is complex and that numerous studies are currently being conducted by government and industry to understand the causes and effects of acid rain.

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Legal counsel to the Air Conservation Committee, Mr. Fred Nelson, stated that he would be unable to offer a legal opinion of the applicability of new BACT requirements for IPP until he had the opportunity to review the IPP air quality permit and the appropriate sections of the Utah Air Quality Regulations. It is presumed that his findings will be presented at the next meeting of the UACC.

The UACC, which consists of 11 members, expressed significant interest in the status of NOx control technology and its application to the IPP, the issue of acid rain, and the status of construction activity at the IPP. The Acting Chairperson of the UACC, Dr. Noel de Nevers, emphasized that the issue of BACT for NOx control is much larger than just IPP and is in fact a national issue. He implied that the Utah DOH should proceed with caution in any NOx BACT determinations due to the possible adverse consequences of setting a new precedent.

A motion was made and unanimously passed by the UACC which directed Dr. Bradford to investigate the following issues and report back to the UACC at the next meeting scheduled for April 15, 1983:

1. A study of the current status of BACT for NOx emissions and an evaluation of the CARB "Guidelines for the Control of Emissions from Coal-Fired Power Plants."
2. An evaluation of the air quality impacts from the IPP considering both proposed NOx control for IPP and NOx control specified in the CARB guidelines.
3. An evaluation of possible acid rain effects due to increased NOx emissions.

If you have any questions or if further information is required, please contact Mr. Stephen A. Clark on extension 3502.

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Attachments

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